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July 6, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
Portals II, Filing Center, TW-A325
Washington, D.C. 20554

**Re: Permian Basin Public Telecommunications, Inc. (FRN 0014-2888-31)
Station KPBT-DT, Odessa TX Facility ID #50044
Request for Long-Term Waiver of the Replication/Maximization
Interference Protection Deadline**

Dear Ms. Dortch

For good cause shown, in accordance with the procedures in *Public Notice (DTV Channel Election Issues)*, DA 06-1255, released June 14, 2006, this letter respectfully requests, on behalf of our client, Permian Basin Public Telecommunications, Inc. ("PBPT"), permittee of Station KPBT-DT, Odessa, Texas, a long-term waiver of the July 1, 2006 replication/maximization interference protection deadline established by the Commission in Paragraph 78 of the *Second DTV Periodic Review Report and Order*, 19 FCC Rcd 18279 (2004).¹

The grounds for this waiver request are compliance delay circumstances clearly beyond PBPT's control and the interconnection between the new DA 06-1255 filing procedures and the older filing freeze limitations for DTV modification applications announced in *Public Notice (Freeze on the Filing of Certain TV and DTV Requests for Allotment)*, DA 04-2446, 19 FCC Rcd 14810 (2004). PBPT's Paragraph 78 requirement is to construct "full, authorized DTV [replication] facilities" by July 1, 2006. To that end, PBPT filed a Special Temporary Authorization ("STA") modification application on June 30, 2006 (File No. BDSTA-20060630AHD), which proposes facilities that will serve 99.6% of the replication facility that PBPT undertook to serve in its November 4, 2004 FCC Form 381 Pre-Election Certification (File No. BCERET-20041104AZI). A copy of that STA modification application is enclosed. (KPBT-DT's current STA facility already serves 99.4%.) PBPT respectfully urges that, especially at 99.6% coverage, PBPT meets the "full" facilities requirement of Paragraph 78, the Commission's DTV policies and rules, and DA 06-1255.

¹ By *Public Notice*, DA 06-1372, released June 29, 2006, the Commission extended the filing deadline in this matter to July 7, 2006.

Marlene H. Dortch, Secretary

July 6, 2006

Page 2

However, DA 06-1255 also required PBPT to file a Form 340 application by July 1, 2006 to transform its STA facility into a modified DTV construction permit and then a DTV license. Of course, insufficient time exists between the June 14, 2006 release date of the DA-06-1255 *Public Notice* and July 7 for all of the application and grant activity that DA 06-1255 envisions. But, more importantly, PBPT's consulting engineers and legal counsel have concluded, with the informal concurrence of Commission staff, that Station KPBT-DT is faced with additional facts that would make it contrary to the public interest for PBPT to be required to file Form 340 and 302-DTV applications at the present time to convert its STA facility into a licensed operation.

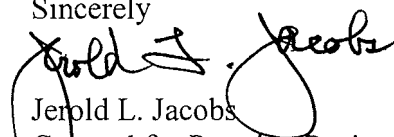
Specifically, KPBT-DT's current DTV construction permit and STA facility are located on the grounds of Odessa Junior College, the former licensee of Station KPBT-TV, in Odessa, Texas. It is anticipated that sometime before the February 17, 2009 DTV transition date, Station KPBT-DT will need to move its transmitter site off of the College's property. However, PBPT has not yet located a new site and, therefore, has no idea whether the "footprint" of that future site would comply with the DA 04-2446 filing freeze restrictions if PBPT were required to file Form 340 and 302-DTV applications NOW, reducing KPBT-DT's facilities to the smaller service area encompassed by its current and proposed STA facilities. (KPBT-DT's current DTV construction permit specifies 500 kW ERP, but its current STA is for 200 kW, and its pending STA modification is for 220 kW.)

Therefore, under these circumstances, PBPT respectfully urges that the Form 340/302-DTV filing requirements in DA 06-1255 should be waived so that KPBT-DT is not foreclosed from filing a Form 340 site change application within the next 30 months having appropriate DTV coverage area within the "footprint" of its current DTV construction permit. If PBPT is required to file a Form 340 NOW, its "footprint" will be reduced in size, and that could prove to be disastrous when PBPT is required to relocate its DTV transmitter site.

Accordingly, PBPT respectfully requests the Commission's understanding and indulgence and: (1) the Commission's affirmance that KPBT-DT's proposed STA facility, which cover 99.6% of its Form 381 certified facility "fully" meets its Paragraph 78 requirements; (2) the Commission's affirmance that PBPT's pending STA modification application obviates the need for PBPT to file a separate STA extension application for the immediate period beyond July 1, 2006 or a Form 337 DTV construction permit extension application; and (3) the Commission's grant of a long-term waiver of the DA 06-1255 interference protection compliance deadline and application procedures for KPBT-DT so that KPBT-DT need not file Form 340 and Form 302-DTV applications until PBPT finds a new DTV transmitter site.

Please direct any communications or correspondence concerning this matter to the undersigned.

Sincerely



Jerold L. Jacobs
Counsel for Permian Basin
Public Telecommunications, Inc.

Enclosure

cc: Shaun Maher, Esq. (FCC - via e-mail – w/enc.)

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0386 (July 2002)	FOR FCC USE ONLY
Engineering STA		FOR COMMISSION USE ONLY
Read Instructions/FAQ before filling out form		FILE NO. - 20060630AHD

Section I - General Information

1.	Legal Name of the Applicant PERMIAN BASIN PUBLIC TELECOMMUNICATIONS, INC.		
	Mailing Address P.O. BOX 8940		
	City MIDLAND	State or Country (if foreign address) TX	Zip Code 79708 - 8940
	Telephone Number (include area code) 4325800036		E-Mail Address (if available) DDOWDY@KPBT.ORG
	FCC Registration No 0014288831	Call Sign KPBT-TV	Facility ID Number 50044
2.	Contact Representative (if other than licensee/permittee) JEROLD L. JACOBS, ESQ.		Firm or Company Name COHN AND MARKS LLP
	Mailing Address 1920 N ST., N.W. SUITE 300		
	City WASHINGTON	State or Country (if foreign address) DC	ZIP Code 20036 - 1622
	Telephone Number (include area code) 2022933860		E-Mail Address (if available) JEROLD.JACOBS@COHNMARKS.COM
3.	Purpose: <input checked="" type="radio"/> Engineering STA <input type="radio"/> Extension of Existing Engineering STA <input type="radio"/> Legal STA <input type="radio"/> Extension of Existing Legal STA		
4.	Service: DS		
5.	Community of License: City: State:		
6.	If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input checked="" type="radio"/> Noncommercial Educational Licensee/Permittee <input type="radio"/> Other		

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

7.1.	Channel: 38
7.2.	Zone: <input type="radio"/> I <input checked="" type="radio"/> II <input type="radio"/> III
7.3.	Antenna Location Coordinates: (NAD 27) Latitude: Degrees 31 Minutes 51 Seconds 58 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: Degrees 102 Minutes 22 Seconds 48 <input checked="" type="radio"/> West <input type="radio"/> East
7.4.	Antenna Structure Registration Number: 1046916 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA
7.5.	Antenna Location Site Elevation Above Mean Sea Level: 888 meters

7.6.	Overall Tower Height Above Ground Level:	91 meters									
7.7.	Height of Radiation Center Above Ground Level:	84 meters									
7.8.	Height of Radiation Center Above Average Terrain:	80 meters									
7.9.	Maximum Effective Radiated Power (average):	220 kW									
7.10.	Antenna Specifications: <input checked="" type="radio"/> Nondirectional <input type="radio"/> Directional a. Manufacturer AND Model ATLO20-H3-HSO-38 b. Electrical Beam Tilt: 0.75 degrees <input type="checkbox"/> Not Applicable c. Mechanical Beam Tilt: degrees toward azimuth degrees True <input checked="" type="checkbox"/> Not Applicable d. Polarization: <input checked="" type="radio"/> Horizontal <input type="radio"/> Circular <input type="radio"/> Elliptical Directional Antenna Relative Field Values: Rotation (Degrees): <input type="checkbox"/> No Rotation										
Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value	Degrees	Value
0		10		20		30		40		50	
60		70		80		90		100		110	
120		130		140		150		160		170	
180		190		200		210		220		230	
240		250		260		270		280		290	
300		310		320		330		340		350	
Additional Azimuths											
8.	Please explain in detail the "extraordinary circumstances" which warrant temporary operations at variance from the Commission's Rules. In addition, please specify 1) the specific rules and/or policies from which the applicant seeks temporary relief; 2) how the public interest will be furthered by grant; and 3) the expected duration of the STA and the licensee's plan for restoration of licensed operation. If requesting variance with other than authorized technical facilities, please specify the exact facilities sought								[Exhibit 21]		
9.	Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.								<input checked="" type="radio"/> Yes <input type="radio"/> No		

I certify that I have prepared Engineering Data on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name MARTIN R. DOCZKAT		Relationship to Applicant (e.g., Consulting Engineer) CONSULTING ENGINEER	
Signature		Date (mm/dd/yyyy) 6/28/2006	
Mailing Address COHEN, DIPPELL AND EVERIST, P.C. 1300 L STREET NW, SUITE 1100			
City WASHINGTON		State or Country (if foreign address) DC	Zip Code 20005 -
Telephone Number (No dashes or parentheses, include area code) 2028980111		E-Mail Address (if available) CDE@ATTGLOBAL.NET	

I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations.

Typed or Printed Name of Person Signing JOHN H. JAMES	Typed or Printed Title of Person Signing PRESIDENT
Signature	Date (mm/dd/yyyy) 6/30/2006

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 21

Description: EXHIBIT E

Attachment 21

Description
Exhibit E - Complete Engineering Statement

ENGINEERING STATEMENT
MODIFICATION OF DTV SPECIAL TEMPORARY AUTHORITY
(FCC FILE NO. BDSTA-20031105AJD)
ON BEHALF OF
KPBT-DT, ODESSA, TEXAS
CHANNEL 38 220 KW ERP 80 METERS HAAT

JUNE 2006

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

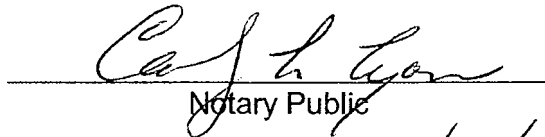
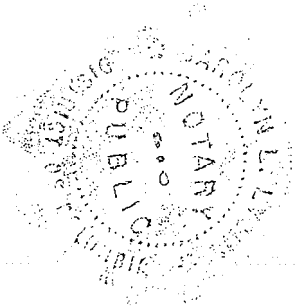
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 28th day of June, 2006.



Notary Public

My Commission Expires: 2/28/2008

This engineering statement has been prepared on behalf of Permian Basin Public Telecommunications, Inc., licensee of KPBT, Odessa, Texas. The purpose of this engineering statement is to accompany its request for application for modification of its STA for digital television ("DTV") facilities (FCC File No. BDSTA-20031105AJD) and to supplement those data required in FCC Form 340.

KPBT-TV, a non-commercial, educational broadcast station, operates on NTSC Television Channel 36 with a maximum visual effective radiated power ("ERP") of 513 kW directional (horizontal polarization) and a height above average terrain ("HAAT") of 88 meters. KPBT-DT has been allocated DTV Channel 22 with facilities of 50 kW and HAAT of 88 meters in the revised DTV Table of Allotments.¹ KPBT-DT has subsequently been granted a rulemaking (MB Docket No. 02-95, RM-10421) to replace its allocated DTV Channel 22 with Channel 38 and now has an outstanding permit to construct DTV facilities of 500 kW and 80 meters HAAT (FCC File No. BMPEDT-20030212AAR). KPBT-DT now proposes to modify its outstanding STA (FCC File No. BDSTA-20031105AJD) by constructing DTV facilities of 220 kW non-directional ERP (horizontal polarization) at a HAAT of 80 meters. The proposed 220 kW non-directional ERP operation will ensure that KPBT-

¹"In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service", MM Docket No. 87-286, Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order (FCC 98-24), 2/12/98, DTV Table of Allotments, Appendix B.

DT will serve approximately 100%² of its FCC Form 381 certified facility to satisfy the July 1, 2006 build-out "use-or-lose" deadline.

There are no AM stations located within 3.22 km of the existing KPBT-TV tower site. There are no FM stations, no other full-service television stations aside from the proposed operation, and one low-power television station, KTLE-LP, transmitting from this site. According to technical staff at the KPBT-TV tower site, KPBT-TV and KOCV(FM) both operate on the same tower more than 200 meters away from the proposed KPBT-DT tower site.

KPBT-DT Tower

The KPBT-DT tower hosts an antenna from which the Channel 38 DTV signal will be transmitted. The proposed DTV antenna will be side-mounted on the tower, therefore, the overall structure height will remain unchanged. The transmitter site is located at 201 W. University Blvd., Odessa, Texas.

The Antenna Structure Registration No. is 1046916. Exhibit E-1 provides a vertical sketch of the tower.

The geographic coordinates of the existing tower are:

North Latitude: 31° 51' 58"

West Longitude: 102° 22' 48"

NAD-27

²Longley-Rice analysis predicts that the proposed 220 kW non-directional ERP operation will serve approximately 99.6% of the FCC Form 381 certified facility which is within a 0.5% rounding tolerance of the 100% requirement set forth for continuance of operation on the currently authorized KPBT-DT channel.

Equipment Data

Antenna: Andrew, Type ATLO20-H3-HSO-38 (or equivalent) horizontally polarized antenna with 0.75° electrical beam tilt. The vertical plane pattern and other exhibits required by Section 73.625(c) are included in Exhibit E-2.

Transmission Line: 305 feet of Andrew, HJ11-50, 4", Air Dielectric, Helix 50 ohm line

Power Data

Transmitter output:	14 kW	11.46 dBk
Transmission Line Loss:	78.9 %	1.03 dB
Input power to the antenna:	11.04 kW	10.43 dBk
Antenna power gain, Main Lobe	20	13.01 dB
Effective Radiated Power, Maximum	220 kW	23.44 dBk

Elevation Data

Vertical dimension of Channel 38 side-mounted antenna	11.6 meters 38.1 feet
Elevation of site above mean sea level	888 meters 2913 feet
Overall height above ground of the proposed antenna and tower structure (including beacon)	91 meters 299 feet
Overall height above mean sea level of proposed tower (including beacon)	979 meters 3212 feet
Center of radiation of Channel 38 antenna above ground	84 meters 276 feet

Center of radiation of Channel 38 antenna above mean sea level	972 meters 3189 feet
Antenna height above average terrain	80 meters

NOTE: Slight height differences result due to conversion to metric.

Coverage

The average elevation data for 3.2 to 16.1 km along each radial have been determined from the USGS 3-second terrain data base. The F(50,90) 48dBu and 41 dBu DTV coverage contours have been computed from reference to the propagation data curves for Channels 14-69, as published by the FCC in Figure 10b and Figure 10c, Section 73.699 of the FCC Rules and Regulations. Utilizing the formula in Section 73.625(b)(2) of the Rules for the effective heights, it is found that the depression angle, A_h , varies from 0.22 to 0.28 degrees. Since the relative vertical field is greater than 90% of the maximum at these depression angles, the maximum power was used in determining the distance to the DTV contour.

Table I includes the distances to the 48 dBu and 41 dBu F(50,90) coverage contours, the average elevation from 3.2 to 16.1 km, and the antenna height above average terrain for every 45 degrees. Exhibit E-3 shows that the 48 dBu F(50,90) coverage contour encompasses the community of license. In Exhibit E-4, the proposed 41 dBu F(50,90) coverage contour is fully contained within the 41 dBu F(50,90) coverage contour of the outstanding construction permit.

Other Licensed and Broadcast Facilities

No adverse technical effect is anticipated by the proposed DTV operation to any other FCC licensed facility. If required, the applicant will install filters or take other measures as necessary to resolve the problem.

FCC Rule, Section 1.1307

The proposed 220 kW operation will utilize an Andrew, Type ATLO20-H3-HSO-38 antenna or the equivalent as described above with a center of radiation above ground of 84 meters. The antenna is side-mounted on the existing single guyed, uniform, cross-section, steel lattice tower with an overall height of 91 meters AGL.

As previously indicated, there are no AM stations located within 3.22 km of the existing tower site. Access to the tower is prevented by a chain link fence with a locked gate.

The proposed operation, based upon the current OET Bulletin No. 65, Edition No. 97-01, dated August 1997 and Supplement A, meets the provisions of the FCC radio frequency field ("RFF") guidelines, and thus, complies with Section 1.1307 of the FCC Rules. Provisions will be made to reduce power or to terminate the transmitter emissions, as appropriate, when it is necessary for authorized personnel to be on the tower. The calculated values of the individual RFF contributions are outlined below.

The elevation pattern provided by the manufacturer for the proposed KPBT-DT operation shows a maximum relative field of less than 0.1 towards the ground in the vicinity of the tower (see Exhibit E-2). Using this relative field factor and the procedures prescribed

in OET Bulletin 65, the maximum RFF resulting from the proposed operation is less than 10.9 uW/cm^2 . This is less than 2.7% of the 411.3 uW/cm^2 maximum human exposure to RFF recommended by the current FCC guidelines for the general public.

KTLE-LP low power television station will continue to transmit from an Andrew, Type AL8 antenna with 5.5 kW maximum ERP at a center of radiation 86.8 meters above ground level. The antenna manufacturer's data indicate that the elevation pattern for this antenna has a maximum relative field value of less than 0.1 towards the ground in the vicinity of the tower (from 65° to 90° below the horizontal). Using this relative field factor and the procedures prescribed in OET Bulletin No. 65, the maximum RFF resulting from the proposed NTSC operation at two meters above the base of the tower is calculated to be less than $0.2 \text{ microwatts/cm}^2$. This is less than 0.1% of the $339.3 \text{ microwatts/cm}^2$ maximum uncontrolled exposure to RFF recommended by the current FCC guidelines for the general population.

The total contribution by the proposed DTV operation and the existing low-power television operation at 2 meters above ground level is less than 2.8% of the current FCC guidelines for general population exposure.

Authorized personnel and rigging contractors will be alerted to the potential zone of high field levels on the tower, and if necessary, the station will operate with reduced power or terminate the operation of the transmitter as appropriate when it is necessary for authorized personnel or contractors to perform work on the tower. Workers and the general public, therefore, will not be subjected to RFF levels in excess of the current FCC guidelines.

An environmental assessment ("EA") is categorically excluded under Section 1.1306 of the FCC Rules and Regulations as the tower was constructed prior to the requirements specified in WT Docket No. 03-128 and the applicant indicates:

- (a)(1) The proposed facilities located on an existing tower are not located in an officially designated wilderness area.
- (a)(2) The proposed facilities located on an existing tower are not located in an officially designated wildlife preserve.
- (a)(3) The proposed facilities located on an existing tower will not affect any listed threatened or endangered species or habitats.
- (a)(3)(ii) The proposed facilities will not jeopardize the continued existence of any proposed endangered or threatened species or likely to result in the destruction or adverse modification of proposed critical habitats.
- (a)(4) The proposed facilities will not affect any known districts, sites, buildings, structures, or objects significant in American history, architecture, archaeology, engineering, or culture.
- (a)(5) The proposed facilities located on an existing tower are not located near any known Indian religious sites.
- (a)(6) The proposed facilities are not located in a flood plain.
- (a)(7) The installation of the DTV facilities on an existing tower at an existing site will not involve a significant change in surface features of the ground in the vicinity of the tower.
- (a)(8) The existing tower lighting will remain unchanged.
- (b) Workers and the general public will not be subjected to RFF levels in excess of the current FCC guidelines contained in OET Bulletin 65 (Edition 97-01) and Supplement A. Authorized personnel will be alerted to areas of the antennas where potential radiation levels are in excess of the FCC guidelines. A security fence with a locked gate precludes access to the tower site.

ABOVE MEAN SEA LEVEL

ABOVE GROUND

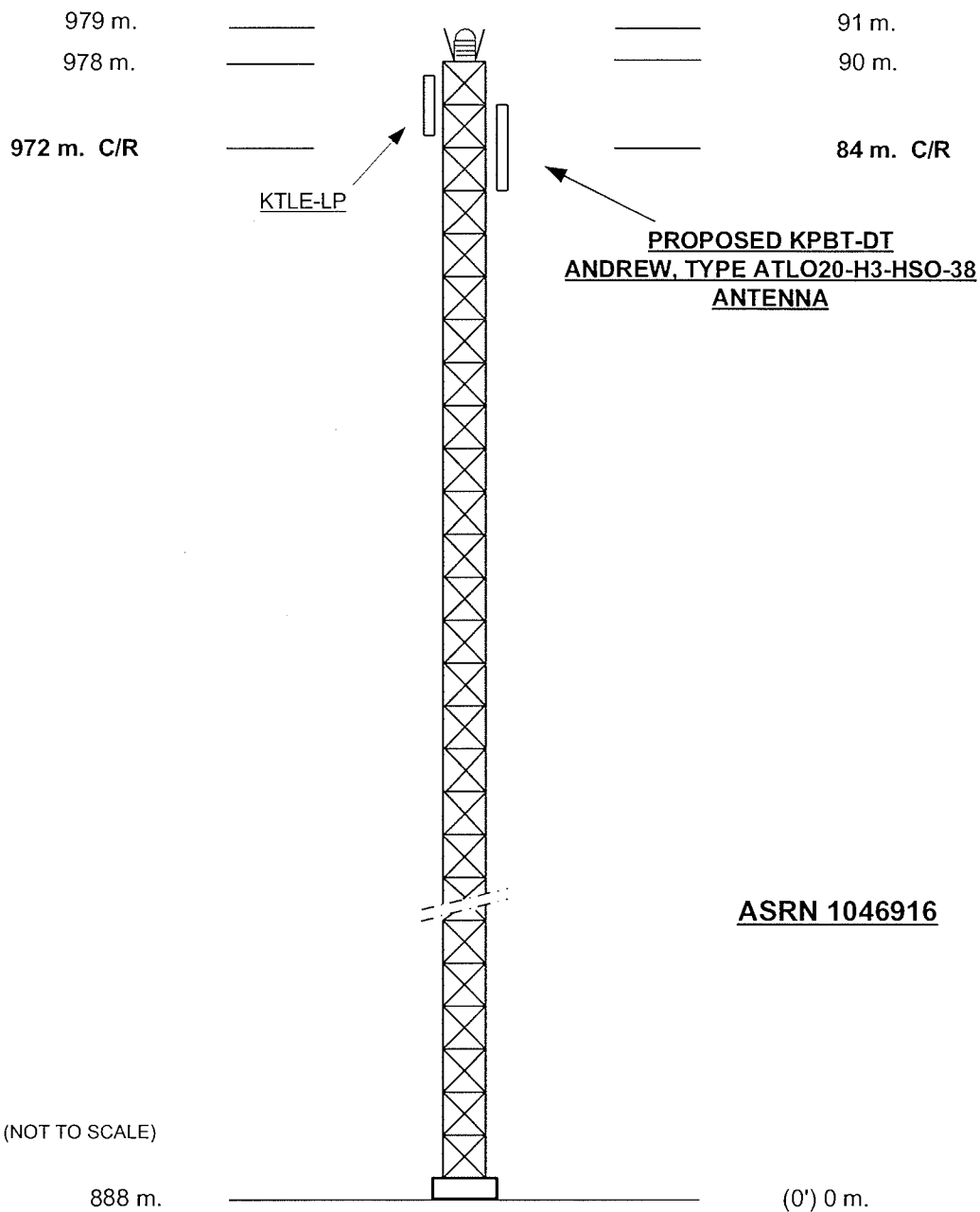


EXHIBIT E - 1
TOWER SKETCH
FOR THE PROPOSED OPERATION OF
KPBT-DT, ODESSA, TEXAS
JUNE 2006

COHEN, DIPPELL and EVERIST, P.C. CONSULTING ENGINEERS

EXHIBIT E-2

ANTENNA MANUFACTURER DATA

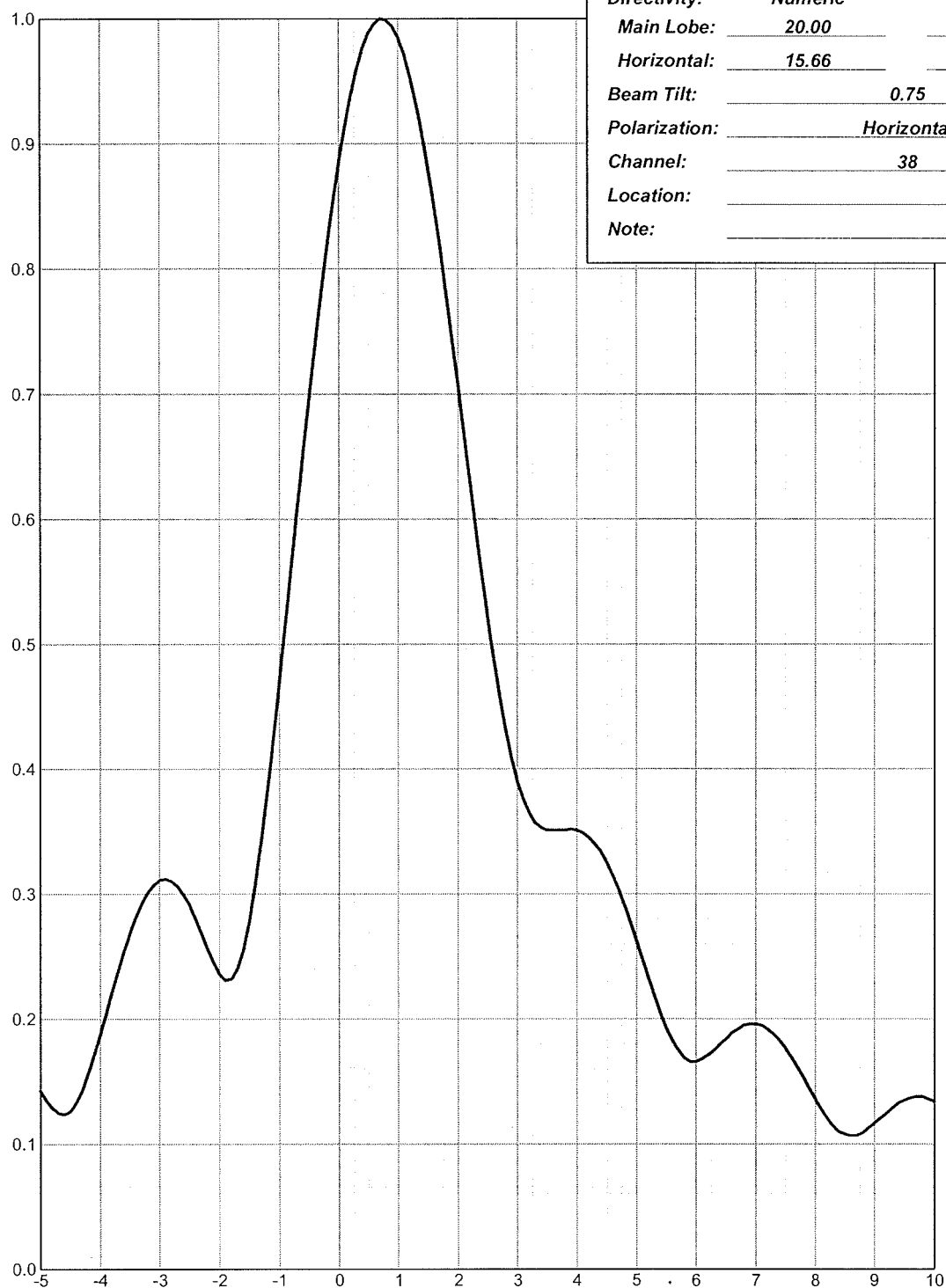
FOR THE PROPOSED OPERATION OF

KPBT-DT, ODESSA, TEXAS

**ANDREW®****ELEVATION PATTERN**

Type:	ATL20H3H	
Directivity:	Numeric	dBd
Main Lobe:	20.00	13.01
Horizontal:	15.66	11.95
Beam Tilt:	0.75	
Polarization:	Horizontal	
Channel:	38	
Location:		
Note:		

Relative Field

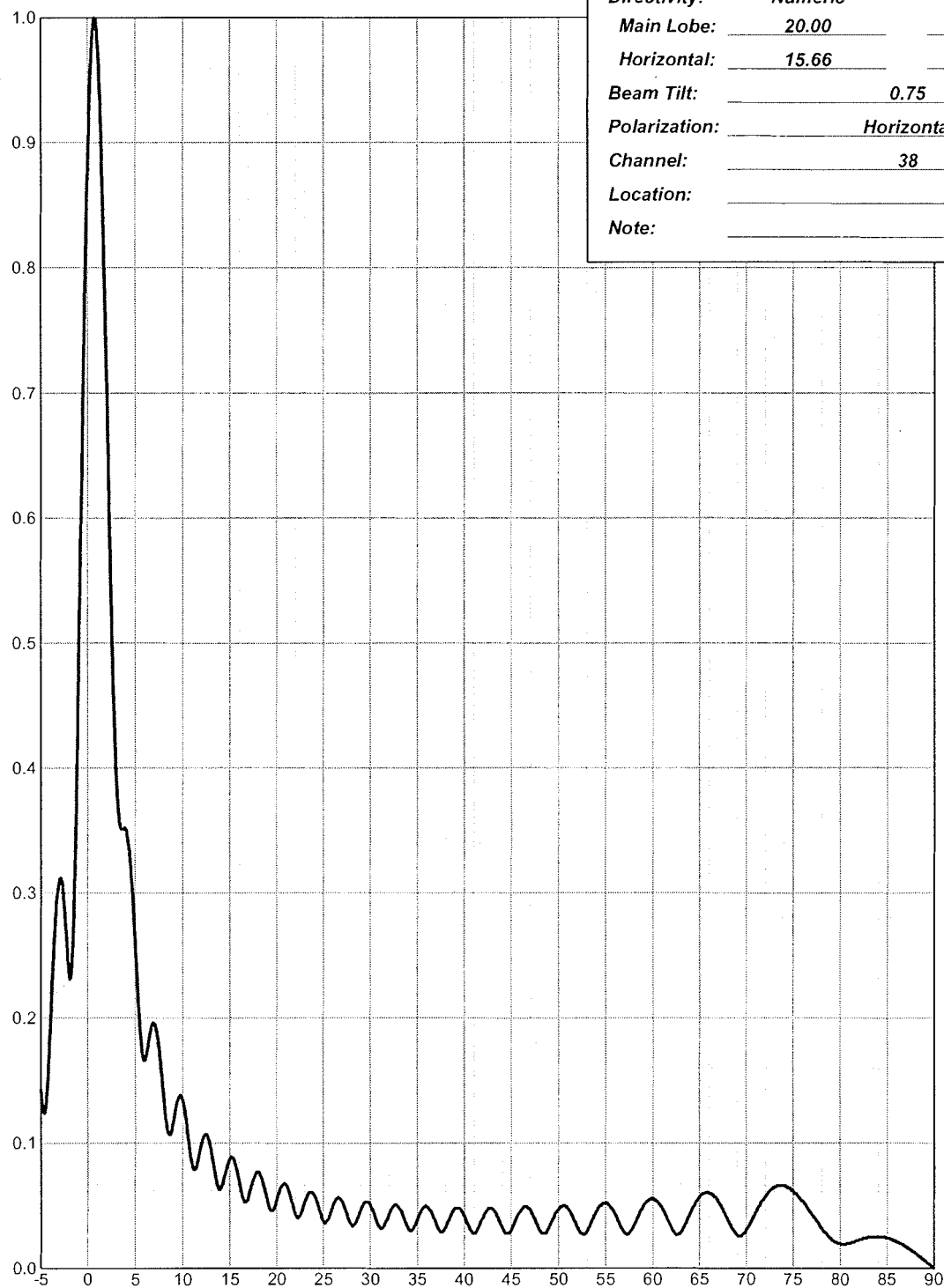


ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A 60462

**ANDREW®****ELEVATION PATTERN**

Type:	ATL20H3H	
Directivity:	Numeric	dBd
Main Lobe:	20.00	13.01
Horizontal:	15.66	11.95
Beam Tilt:	0.75	
Polarization:	Horizontal	
Channel:	38	
Location:		
Note:		

Relative Field



ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A 60462



ELEVATION TABULATED DATA

Type: ATL20H3H

Polarization: Horizontal

Angle	Field	dB	Angle	Field	dB	Angle	Field	dB	Angle	Field	dB
-5.00	0.143	-16.89	6.50	0.184	-14.70	42.00	0.041	-27.74	88.00	0.012	-38.42
-4.75	0.127	-17.92	6.75	0.194	-14.27	43.00	0.047	-26.56	89.00	0.006	-44.44
-4.50	0.126	-17.99	7.00	0.196	-14.15	44.00	0.034	-29.37	90.00	0.000	0.00
-4.25	0.149	-16.51	7.25	0.190	-14.42	45.00	0.030	-30.46			
-4.00	0.187	-14.56	7.50	0.177	-15.04	46.00	0.046	-26.74			
-3.75	0.230	-12.77	7.75	0.158	-16.03	47.00	0.047	-26.56			
-3.50	0.268	-11.44	8.00	0.136	-17.33	48.00	0.031	-30.17			
-3.25	0.296	-10.56	8.25	0.118	-18.56	49.00	0.032	-29.90			
-3.00	0.311	-10.14	8.50	0.108	-19.33	50.00	0.047	-26.56			
-2.75	0.308	-10.23	8.75	0.108	-19.33	51.00	0.048	-26.38			
-2.50	0.291	-10.72	9.00	0.117	-18.64	52.00	0.033	-29.63			
-2.25	0.262	-11.63	9.25	0.127	-17.92	53.00	0.029	-30.75			
-2.00	0.236	-12.54	9.50	0.135	-17.39	54.00	0.045	-26.94			
-1.75	0.236	-12.54	9.75	0.138	-17.20	55.00	0.052	-25.68			
-1.50	0.279	-11.09	10.00	0.134	-17.46	56.00	0.043	-27.33			
-1.25	0.363	-8.79	11.00	0.084	-21.51	57.00	0.028	-31.06			
-1.00	0.469	-6.58	12.00	0.099	-20.09	58.00	0.034	-29.37			
-0.75	0.584	-4.67	13.00	0.097	-20.26	59.00	0.050	-26.02			
-0.50	0.697	-3.14	14.00	0.063	-24.01	60.00	0.056	-25.04			
-0.25	0.799	-1.95	15.00	0.087	-21.21	61.00	0.048	-26.38			
0.00	0.885	-1.06	16.00	0.071	-22.97	62.00	0.032	-29.90			
0.25	0.948	-0.46	17.00	0.056	-25.04	63.00	0.029	-30.75			
0.50	0.988	-0.10	18.00	0.077	-22.27	64.00	0.044	-27.13			
0.75	1.000	0.00	19.00	0.055	-25.19	65.00	0.057	-24.88			
1.00	0.985	-0.13	20.00	0.054	-25.35	66.00	0.060	-24.44			
1.25	0.944	-0.51	21.00	0.067	-23.48	67.00	0.053	-25.51			
1.50	0.881	-1.10	22.00	0.044	-27.13	68.00	0.039	-28.18			
1.75	0.800	-1.93	23.00	0.052	-25.68	69.00	0.027	-31.37			
2.00	0.709	-2.99	24.00	0.059	-24.58	70.00	0.031	-30.17			
2.25	0.613	-4.25	25.00	0.038	-28.40	71.00	0.045	-26.94			
2.50	0.522	-5.65	26.00	0.050	-26.02	72.00	0.057	-24.88			
2.75	0.446	-7.02	27.00	0.054	-25.35	73.00	0.065	-23.74			
3.00	0.390	-8.18	28.00	0.035	-29.12	74.00	0.066	-23.61			
3.25	0.361	-8.85	29.00	0.047	-26.56	75.00	0.062	-24.15			
3.50	0.351	-9.09	30.00	0.051	-25.85	76.00	0.054	-25.35			
3.75	0.351	-9.09	31.00	0.033	-29.63	77.00	0.043	-27.33			
4.00	0.351	-9.09	32.00	0.043	-27.33	78.00	0.032	-29.90			
4.25	0.343	-9.31	33.00	0.049	-26.20	79.00	0.024	-32.40			
4.50	0.325	-9.76	34.00	0.033	-29.63	80.00	0.020	-33.98			
4.75	0.297	-10.53	35.00	0.039	-28.18	81.00	0.020	-33.98			
5.00	0.263	-11.60	36.00	0.049	-26.20	82.00	0.023	-32.77			
5.25	0.226	-12.92	37.00	0.036	-28.87	83.00	0.025	-32.04			
5.50	0.193	-14.29	38.00	0.032	-29.90	84.00	0.025	-32.04			
5.75	0.172	-15.29	39.00	0.048	-26.38	85.00	0.024	-32.40			
6.00	0.166	-15.60	40.00	0.042	-27.54	86.00	0.021	-33.56			
6.25	0.173	-15.24	41.00	0.028	-31.06	87.00	0.017	-35.39			



ANDREW CORPORATION
10500 W. 153rd Street
Orland Park, Illinois U.S.A 60462

TABLE I
COMPUTED COVERAGE DATA
FOR THE PROPOSED DTV OPERATION OF
KPBT-DT, ODESSA, TEXAS
CHANNEL 38 220 KW 80 METERS HAAT
JUNE 2006

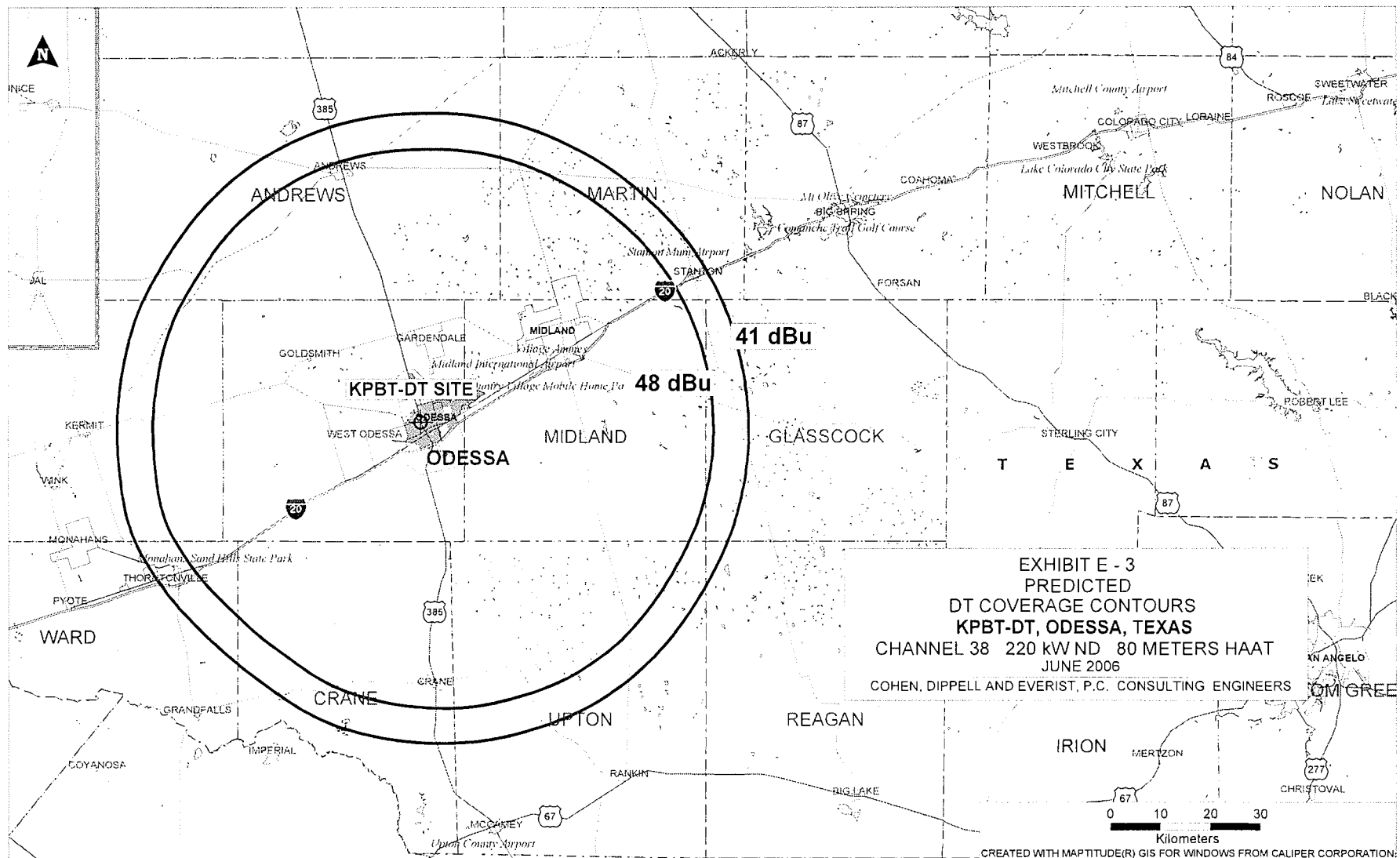
<u>Radial</u> <u>Bearing</u> N ° E, T	<u>Average*</u> <u>Elevation</u> <u>3.2 to 16.1 km</u>	<u>Effective</u> <u>Height</u> meters	<u>Depression</u> <u>Angle</u>	<u>ERP At</u> <u>Radio</u> <u>Horizon</u> kW	<u>Distance to Contour F(50,90)</u>	
	meters				<u>48 dBu</u> <u>City Grade</u> km	<u>41 dBu</u> <u>Noise-Limited</u> km
0	900.5	71.5	0.234	220	54.6	61.7
45	887.6	84.4	0.254	220	56.6	63.8
90	872.3	99.7	0.277	220	58.7	65.8
135	868.4	103.6	0.282	220	59.2	66.2
180	884.5	87.5	0.259	220	57.1	64.2
225	907.2	64.8	0.223	220	53.4	60.6
270	906.0	66.0	0.225	220	53.6	60.8
315	907.7	64.3	0.222	220	53.3	60.5
Average	892.0	80.0				

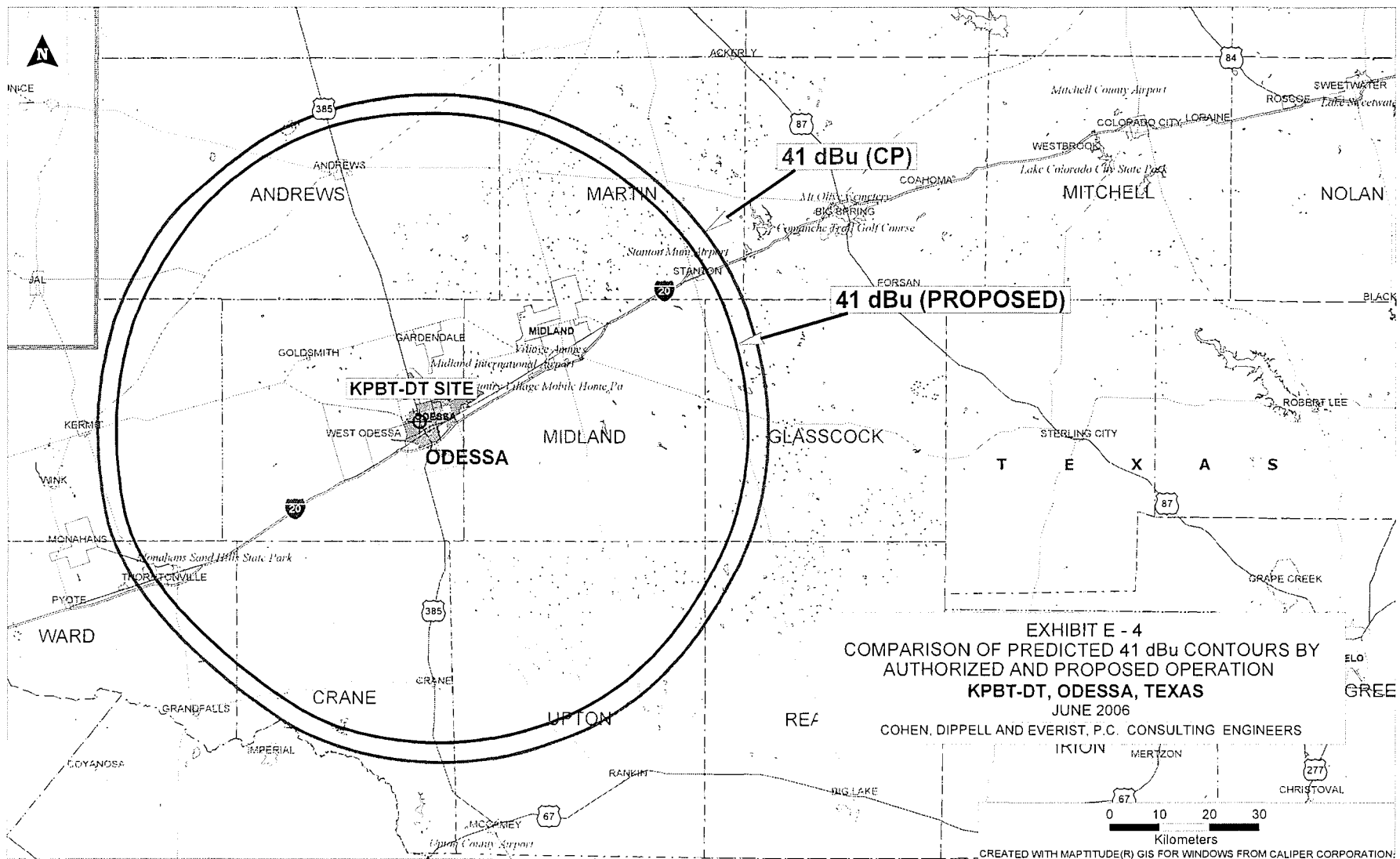
*Based on data from FCC 3-second data base

DTV Channel 38 (614-620 MHz)
Average Elevation 3.2 to 16.1 km 892 meters AMSL
Center of Radiation 972 meters AMSL
Antenna Height Above Average Terrain 80 meters
Effective Radiated Power 220 kW (23.42 dBk)

North Latitude: 31° 51' 58"
West Longitude: 102° 22' 48"

(NAD-27)





SECTION VII- DTV Engineering

Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.

Certification Checklist: A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:
 - (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No
 - (b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No
 - (c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☒ Yes ☐ No

Applicant must **submit the Exhibit** called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. ☒ Yes ☐ No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☒ Yes ☐ No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☒ Yes ☐ No

SECTION VII - DTV Engineering

TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Channel Number: DTV 38 Analog TV, if any 36
2. Zone: ☐ I ☒ II ☐ III
3. Antenna Location Coordinates: (NAD 27)

<u>31</u>	°	<u>51</u>	'	<u>58</u>	"	<input checked="" type="checkbox"/> N	<input type="checkbox"/> S	Latitude
<u>102</u>	°	<u>22</u>	'	<u>48</u>	"	<input type="checkbox"/> E	<input checked="" type="checkbox"/> W	Longitude
4. Antenna Structure Registration Number: 1046916

☐ Not applicable
 ☐ FAA Notification Filed with FAA
5. Antenna Location Site Elevation Above Mean Sea Level: 888 meters
6. Overall Tower Height Above Ground Level: 91 meters
7. Height of Radiation Center Above Ground Level: 84 meters
8. Height of Radiation Center Above Average Terrain: 80 meters
9. Maximum Effective Radiated Power (average power): 220 kW
10. Antenna Specifications:

a. Manufacturer	Andrew	Model	ATLO20-H3-HSO-38
-----------------	---------------	-------	-------------------------

b. Electrical Beam Tilt: 0.75 degrees ☐ Not Applicable
 c. Mechanical Beam Tilt: _____ degrees toward azimuth _____ degrees True ☒ Not Applicable
 Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c).

Exhibit No.
E-2

d. Polarization: ☒ Horizontal ☐ Circular ☐ Elliptical

TECH BOX

- e. Directional Antenna Relative Field Values: ☒ Not applicable (Nondirectional)
 Rotation: _____ ° ☐ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No.

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") ☒ Yes ☐ No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

Exhibit No.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No.

13. **Environmental Protection Act. Submit in an Exhibit** the following:

Exhibit No.
E

- a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.


By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.

Section VII -- Preparer's Certification

I certify that I have prepared Section VII (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Martin R. Doczkat Cohen, Dippell and Everist, P.C.		Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 		Date June 28, 2006	
Mailing Address 1300 L Street, NW Suite 1100			
City Washington		State or Country (if foreign address) DC	ZIP Code 20005
Telephone Number (include area code) (202) 898-0111		E-Mail Address (if available) cde@attglobal.net	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001),
AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)),
AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).